

# **EXHIBIT FF**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND, NORTHERN DIVISION**

**EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION,**

**Plaintiff,**

**and**

**KATHY KOCH,**

**Intervenor/Plaintiff,**

**V.**

**LA WEIGHT LOSS CENTERS, INC.,**

**Defendant.**

[illegible]

**CASE NO.: WDQ 02-CV-648**

## JURY DEMANDED

## DECLARATION OF CHRISTOPHER STARR

I, Christopher Starr, declare:

1. I am the Director of Practice Technology with the law firm Wolf, Block, Schorr and Solis-Cohen LLP.
2. I am responsible for document production in this matter. In that capacity, I am the primary contact with Copy Secure, a third party vendor providing copying, printing, imaging and bates labeling services.
3. After counsel reviews documents for production, I arrange for the documents to be delivered to Copy Secure for electronic imaging and bates labeling. When they are ready for delivery via CD, Copy Secure notifies me and EEOC.
4. Over the course of this litigation, EEOC often failed to retrieve LAWL's document production for months and, in some instances, close to one year. Attached is a true and correct copy of a spreadsheet I received from Copy Secure showing, among other things, the dates on which EEOC was notified that documents were available and the dates on which the documents were shipped.
5. During expert discovery, I was given a list of approximately 2,300 applicant names generated from the Access Database by LAWL's consultants.
6. I provided the list to Copy Secure along with CD's containing applicant resumes and telephone pre-screening forms categorized by geographic market.

7. I instructed Copy Secure to search for and print resumes and telephone pre-screening forms corresponding to each of the 2,300 names on the list. Copy Secure located documents for all but 600 applicants.

8. Copy Secure printed the documents and made multiple copy sets. One copy set was sent via Federal Express to LAWL's expert, David Jones, Ph.D. I was provided with the master set.

9. Copy Secure also gave me a list of the applicants for whom no documents were found. I understand – and the Access Database confirms – that roughly 400 of the applicants sought positions in licensee markets or were speared.

10. Paralegals performed a quick search of the CD's to locate resumes for some of the remaining 200 names on the list. They were able to locate most of the resumes for which they searched. The paralegals found that the resumes were overlooked by Copy Secure because of miscoding, misspelling or inaccurate file type.

11. Attached as Exhibit GG is a true and correct copy of a spreadsheet showing, among other things, the applicant materials found and where or how they were located.

12. In or around March 2005, I coordinated the collection, imaging and recovery of data from an LAWL computer hard drive containing Zurich payroll data. Kroll Ontrack, a third party vendor engaged by both EEOC and LAWL, performed the data recovery. On or around April 5, 2005, Kroll Ontrack sent a copy of all active data in native format directly to EEOC.

I certify under penalty of perjury that the foregoing is true and correct. Executed on May 2, 2007.

A handwritten signature in black ink, appearing to read 'Christopher Starr', written over a horizontal line.

Christopher Starr

Date Doc's Rec. from Wolf Block	Box # in		Invoice #	Bates Range	CD's	Date Notified EEOC	Date Received PO #	Date	
	Boxes	Collection						Payment	Shipped
LA Series									
10/11/2005	1	105	PH05-3533A,B	LA-0250052 to LA-0252216	1	10/12/2005	12/21/2005	Paid 2-28-06	1/25/2006
10/12/2005	17	106 to 123	PH05-3545A,B	LA-0252217 to LA-0311212	8	10/13/2005	12/21/2005	Paid 2-28-06	1/25/2006
11/14/2005	1	124	PH05-3707A,B	LA-0311213 to LA-0312912	1	11/15/2005	12/21/2005	Paid 2-28-06	1/25/2006
11/22/2005	stack	126	PH05-3737A	LA-0312913 to LA-0312929	1	11/23/2005	3/7/2006	Paid 4-21-06	4/3/2006
11/30/2005	stack	127 to 129	PH05-3763A	LA-0312930 to LA-0313075	1	12/1/2005	3/7/2006	Paid 4-21-06	4/3/2006
12/12/2005	stack	131	PH05-3880A	LA-0313076 to LA-0313114	1	12/13/2005	3/7/2006	Paid 4-21-06	4/3/2006
12/21/2005	2	132 and 133	PH05-3868A	LA-0313115 to LA-0317934	2	12/27/2005	3/7/2006	Paid 4-21-06	4/3/2006
2/1/2006 to 2/28/2006	12	134 to 145	PH06-3996A	LA-0317935 to LA-0349431	7	2/28/2006	3/7/2006	Paid 4-21-06	4/3/2006
3/1/2006 to 3/31/2006	20	146 to 168	PH06-4212A	LA-0349432 to LA-0402093	8	4/20/2006		Paid 3-15-07	3/15/2007
LAP Series									
6/26/2005	1	93	PH05-3445A,B	LAP-0109616 to LAP-0110126	1	6/28/2005	12/21/2005	Paid 2-28-06	1/25/2006
11/1 and 11/8/2005	1	94 and 95	PH05-3645A	LAP-0110127 to LAP-0111357	1	11/11/2005	12/21/2005	Paid 2-28-06	1/25/2006
11/10/2005	1	96,97,98	PH05-3694A	LAP-0111358 to LAP-0112174	1	11/14/2005	12/21/2005	Paid 2-28-06	1/25/2006
11/18/2005	stack	99	PH05-3730A	LAP-0112175 to LAP-0112221	1	11/19/2005	3/7/2006	Paid 4-21-06	3/31/2006
11/30/2005	stack	100 and 101	PH05-3762A	LAP-0112222 to LAP-0112541	2	12/1/2005	3/7/2006	Paid 4-21-06	3/31/2006
12/8/2005	1	102	PH05-3815A	LAP-0112542 to LAP-0113138	1	12/9/2005	3/7/2006	Paid 4-21-06	3/31/2006
12/19/2005	2	103 to 106	PH05-3853A	LAP-0113139 to LAP-0116516	2	12/21/2005	3/7/2006	Paid 4-21-06	3/31/2006
1/3/2006	Misc	107 to 113	PH06-3889A	LAP-0116517 to LAP-0118074	7	2/28/2006	3/7/2006	Paid 4-21-06	3/30/2006
2/1/2006 to 2/28/2006	Misc	114 to 116	PH06-4176A	LAP-0118075 to LAP-0118734	3	2/28/2006	3/7/2006	Paid 4-21-06	3/30/2006
3/1/2006 to 3/31/2006	3	117 to 121	PH06-4319A	LAP-0118735 to LAP-0124131	4	4/20/2006		Paid 3-15-07	3/15/2007